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Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Ex Parte Communication -- Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153; Framework for Next Generation 911 Deployment, PS Docket No. 10-255

Dear Ms. Dortch:

This letter is to inform you that on October 17, 2012, Jay Pabley, Jean-Luc Barthelemy, Tim Hogle, Steven Zweifach, Kristi Buckendahl, Sean Hoelzle, Jethendranath Chalasani, Charles McKee, and the undersigned, all of Sprint Nextel Corporation ("Sprint"), met with Charles Mathias, Special Counsel to the Chairman, Henning Schulzrinne, Chief Technology Officer, David Turetsky, Chief of the Public Safety and Homeland Security Bureau, and David Furth and Patrick Donovan of the Public Safety and Homeland Security Bureau, regarding the technological feasibility and parameters surrounding provision of wireless "text-to-911" services.

Sprint provided Commission staff with technical details regarding how Sprint's existing SMS text messaging system functions. In addition, Sprint discussed steps that would be necessary to enable its existing SMS messaging system to send text messages to a Public Safety Answering Point ("PSAP") and explained that, even if these steps are taken, SMS messages received by PSAPs will not include the same type of information, such as device location, currently provided with a voice 9-1-1 call. Sprint explained the routing of such calls would likely require some type of centralized "gateway" to receive and process SMS messages and route them to the appropriate PSAP. Sprint also explained that the location information that would be passed to the PSAP would likely be the cell site sector centroid location and not the precise location of the wireless handset. Sprint discussed the reliability of SMS messaging and noted that if there is an issue on the air interface, for example, Sprint's network would not receive the message and an automatic reply message ("auto reply") could therefore not be issued.

In addition, Sprint noted it is testing various conditions that generate auto reply messages, that there are other potential points of failure where an auto reply would not to be issued and that consumers will not have the same level of certainty that a text-to-911 message has been received as they do today when a voice call to 9-1-1 is answered by a PSAP.

Sprint also explained that it would likely require a minimum of six months from the effective date of any mandate to develop and implement any type of auto reply message from its network back to its subscribers if text-to-911 functionality is not available in an area or if the appropriate PSAP is not able to accept SMS messages. Even if Sprint were to consider utilizing a third-party provider for text-to-911 services that also offered such an auto reply message as part of its service, Sprint would need the flexibility and time to negotiate with available vendors in the marketplace for such services and to eventually implement them in its nationwide network.

Sprint discussed its plans for exploring and evaluating the different technological approaches for an interim text-to-911 offering and explained that it is considering participation in limited trials with one or more jurisdictions and various vendors to test these systems. Sprint also provided technical information regarding how it expects its SMS network may migrate in the future as carriers move toward an internet protocol-based Next Generation 9-1-1 system and how that migration could be expected to impact interim text-to-911 offerings, if implemented. In addition, Sprint discussed various “over-the-top” messaging applications consumers are currently using for text messaging and that Sprint would not be able to control those third-party commercial offerings nor influence how wireless consumers utilize such applications. Sprint also discussed the complexities involved in providing wireless services while roaming and how there are many unanswered questions surrounding the technological capability to provide text-to-911 to Sprint subscribers that roam onto another wireless network, as well as customers of other wireless carriers that roam onto Sprint’s network. There was also some discussion about the potential limitations of certain older, embedded wireless devices currently in use on Sprint’s network that may not support the use of three-digit short codes, such as 9-1-1, and the importance that any mandate related to text-to-911 be adopted on a going-forward basis.

Sprint reiterated that it remains very concerned there will be significant confusion for wireless consumers immediately after the Commission adopts any regulations related to text-to-911 and that the Commission should take steps to clarify for consumers exactly what is required and what will not be available for the foreseeable future. Sprint continued to urge the Commission to proceed cautiously and noted the risks of unrealistic consumer expectations that could accompany any Order adopted by the FCC.

Finally, Sprint reminded Commission staff that the nationwide Nextel iDEN network is scheduled to be fully decommissioned no later than June 30, 2013, and therefore any regulatory

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obligations being contemplated related to text-to-911 should not apply to outdated technologies that are being phased-out within a reasonable period of time. Sprint explained that it currently operates two separate and distinct SMS networks and it did not intend to offer text-to-911 service nor transmit an auto reply message to subscribers on its iDEN network that attempt a text message to 9-1-1.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Sincerely,

/s/ Ray Rothermel

Ray Rothermel

cc: Charles Mathias
Henning Schulzrinne
David Turetsky
David Furth
Patrick Donovan